

# EXHIBIT K

*If this is an emergency, please call 911 or the University of Michigan Police Department at (734) 763-1131.*

The [Student Organization Advancement and Recognition \(SOAR\) Accountability Process](#) allows members of the University community (enrolled students, faculty, and staff members) to bring complaints against student organizations for violations of the [Standards of Conduct for Recognized Student Organizations](#). It is important to note that this is an educational process, not a legal one.

This is an intake form that will notify the Center for Campus Involvement (CCI) of your allegation, and a CCI staff member will follow up with you to discuss next steps - it does not function as a formal complaint submission.

This is not a confidential reporting form - all SOAR complaints must have an identified complainant. If you are seeking to make a complaint in regards to discrimination, discriminatory harassment or sexual misconduct, please submit your report through the [Equity, Civil Rights, and Title IX Office](#).

Confidential resources can be found at <https://sexualmisconduct.umich.edu/student-resources/>

**Q2. Your First Name**

Stephanie

**Q3. Your Last Name**

Jackson

**Q4. Your Umich Email Address**

[REDACTED]

**Q5. Organization you are submitting a complaint against**

Students Allied for Freedom and Equality (S.A.F.E.)

**Q13. Name of Organization Representative**

[REDACTED]

**Q15. Email Address of Organization Representative**

[REDACTED]

**Q16. Position/Title of Organization Representative**

President of S.A.F.E., August 2024 - present

**Q6. Please name the specific [Standard of Conduct for Recognized Student Organizations](#) that you are alleging this organization has violated. The Standards are listed for reference on Section III of the Standards document. Please review the specific Standard(s) in the document, then select all that apply.**

- 1. Health and Safety
- 6. Appropriate Use of Space
- 10. Adherence to Other University Policies

**Q17. Please indicate which SOAR Pathway you are requesting for this complaint.**

- Formal Pathway (Hearing)

**Q7. Please provide a narrative description of your allegation below.**

Please see the Formal Complaint uploaded in the first evidence file below.

**Q18. Please identify the resolution(s) that you would like to see as a result of the SOAR process.**

The University concludes that S.A.F.E. violated the Standards of Conduct by a preponderance of the evidence. The University has considered precedent set by sanctions given to other RSOs found to have engaged in comparable, serious behavior. Accordingly, the University asks that S.A.F.E. be subject to a two to four-year suspension as an appropriate and necessary corrective action to hold S.A.F.E. accountable for their conduct outlined in this Complaint.

**Draft SOAR Complaint**

Q2. Your First Name

Stephanie Jackson, University Complaint Representative

Q3. Your Last Name

Stephanie Jackson, University Complaint Representative

Q4. Your Umich Email Address

[REDACTED]

Q5. Organization you are submitting a complaint against

Students Allied for Freedom and Equality (S.A.F.E.)

Q13. Name of Organization Representative

[REDACTED]

(President of S.A.F.E., August 2024 - present)

Q15. Email Address of Organization Representative

Email:

[REDACTED]

Q16. Position/Title of Organization Representative

President of S.A.F.E.

Q6. Please name the specific Standard of Conduct for Recognized Student Organizations that you are alleging this organization has violated. The Standards are listed for reference in Section III of the Standards document. Please review the specific Standard(s) in the document, then select all that apply.

1. III.B.6. Appropriate Use of Space;
2. III.B.10. Adherence to Other University Policies; and
3. III.B.1. Health and Safety.

Q17. Please indicate which SOAR Pathway you are requesting for this complaint.

Formal Pathway (Hearing)

Q7. Please provide a narrative description of your allegation below.

**Date of Report: October 31, 2024**

### **Allegation(s):**

The University of Michigan (or “University”) alleges that the Recognized Student Organization (“RSO”), Students Allied for Freedom and Equality (“S.A.F.E.”), has violated the [Standards of Conduct for Recognized Student Organizations](#) (“Standards of Conduct”) in August 2024 and May 2024. Specifically, S.A.F.E. violated the Standards of Conduct when it:

1. Held a demonstration on the Central Campus Diag on August 28, 2024, during Festifall without University permission and after notice was sent to S.A.F.E. denying any request to use that space that day; and,
2. Hosted and participated in an unwelcome, disruptive, threatening, and unsafe demonstration at the private residence of Regent Sarah Hubbard on the morning of May 15, 2024.

### **Alleged Policy Violations:**

- [Standards of Conduct for Recognized Student Organizations](#)
  1. III.B.6. **Appropriate Use of Space.** RSOs must use University-controlled spaces in accordance with the standards of the particular space.
  2. III.B.10. **Adherence to Other University Policies.** RSOs must adhere to University policies, including but not limited to the Statement of Student Rights and Responsibilities, the University’s computer use policies, Policy on Alcohol and Other Drugs, Student Sexual Misconduct and Gender-Based Misconduct and Other Forms of Interpersonal Violence Policy, Dance and Party Policy, Diag Policy, and housing policies.
    - a. [Central Campus Diag/North Campus Gerstacker Grove Policies and Procedures](#)
    - b. [Festifall policies](#)
    - c. [University of Michigan Division of Public Safety & Security, Protests and Demonstrations](#)
  3. III.B.1. **Health and Safety.** RSOs must not foster, promote, or participate in activities that unreasonably threaten the safety or well-being of their members, other people, or animals.

### **Scope of Policy**

RSO behavior that occurs within the City of Ann Arbor, on University-controlled property, or at University sponsored events or programs may violate the Standards of Conduct. Behavior that occurs outside of the City of Ann Arbor or outside University-controlled property may violate the

Standards of Conduct if the behavior poses an obvious and serious threat or harm to any member(s) of the University community.

### **Standard of Review**

In order to determine that a group has violated the Standards of Conduct, the standard of proof required is a preponderance of evidence, i.e., the evidence demonstrates that it is more likely than not that the conduct occurred.

### **Evidence Reviewed and Will Be Submitted with the Formal Complaint**

The University collected and reviewed the following evidence during the course of writing this complaint:

- [Students Allied for Freedom and Equality Maize Page](#)
- TAHRIR Coalition [weg page](#) and list of membership
- [Center for Campus Involvement's Student Organizations](#) page
- Email from Nicholas Smith, Director of the Center for Campus Involvement, to [REDACTED], S.A.F.E. President, on August 27, 2024 at 6:36 PM
- @ safeumich Instagram post, [https://www.instagram.com/p/C\\_LfBHfvWAd/?igsh=MTE4dTBtb2JoMmM3eg%3D%3D](https://www.instagram.com/p/C_LfBHfvWAd/?igsh=MTE4dTBtb2JoMmM3eg%3D%3D), August 27, 2024
- @ safeumich Instagram post, [https://www.instagram.com/reel/C\\_OV8NJJ9Qz/?igsh=dG84aGdsdjYxY3Y4](https://www.instagram.com/reel/C_OV8NJJ9Qz/?igsh=dG84aGdsdjYxY3Y4), August 28, 2024
  - Evidence provided by the University regarding the S.A.F.E. demonstration at Festifall on August 28, 2024
    - S.A.F.E. Instagram screenshot 2024-10-03 at 11.15.48 AM
- @ safeumich Instagram post, [https://www.instagram.com/reel/C\\_PGaCagYx4/?igsh=MTZjeGFuaThuMmcwdQ%3D%3D](https://www.instagram.com/reel/C_PGaCagYx4/?igsh=MTZjeGFuaThuMmcwdQ%3D%3D), August 28, 2024
  - Evidence provided by the University regarding the S.A.F.E. demonstration at Festifall on August 28, 2024
    - S.A.F.E. Instagram screenshot 2024-10-03 at 11.16.25 AM
- Article in The Michigan Daily, "[Festifall spotlights hundreds of organizations on North and Central Campus](#)," by Alyssa Tisch, August 29, 2024

- [SAFE Instagram Post on May 15, 2024](#)
- Photographs and social media posts of students delivering demands to Regent Hubbard's private residence
  - Photos of the yard
  - Ring camera video and photos
  - Photo of front porch
  - Photos of the demand letter posted to Regent Hubbard's front door
  - Flashpoint on Local 4 News Interview, aired on May 19, 2024
  - X posts from May 16, 2024 and May 22, 2024
  - Photo of S.A.F.E. students and body bags from S.A.F.E. social media
- Evidence collected by the University regarding S.A.F.E.'s social media activity
  - May 15 Instagram photos by S.A.F.E. at Regent Hubbard's private residence
  - Photos from S.A.F.E. Instagram account targeting Regent Hubbard posted on May 28, 2024
  - May 22 Instagram posts by S.A.F.E. targeting Regent Hubbard
- SAFE Instagram Post on October 16, 2024
- [Diag / Gove Reservation Process: Policies for Diag Use](#)
- [University of Michigan Division of Public Safety & Security. Protests and Demonstrations](#)
- [Festifall policies](#)

#### **Application of Facts, Analysis, and Conclusions**

- 1. S.A.F.E. Demonstration on the Central Campus Diag during Festifall on August 28, 2024 and S.A.F.E. Use of Diag for Tabling / Sale on October 16, 2024**
  - a. Violation of III.B.6. Appropriate Use of Space**

As a preliminary matter, S.A.F.E. is an active RSO at the University. S.A.F.E.'s active student organization status with the University is evident by the fact that they have a [student organization page](#) that is visible on the public facing website maintained by the Center for Campus Involvement ("CCI"). The recognition of student organizations is the responsibility of the CCI within University Unions in the Division of Student Life.

All RSOs must use University-controlled spaces “in accordance with the standards of the particular space.” For some of the more popular spaces on campus, like the Diag, there are certain standards and requirements that must be adhered to in order to utilize the space in a safe and inclusive manner.

Turning to S.A.F.E.’s demonstration on the Diag during Festifall on August 28, 2024 and S.A.F.E.’s use of the Diag for an event on October 16, 2024, S.A.F.E. violated the Appropriate Use of Space Standard when it did the following:

- Did not ask CCI or the University for permission to use the Diag for an organized event.
  - Nicholas Smith, Director of the Center for Campus Involvement (CCI), stated that he heard about the event the day before it was planned after a social media advertisement was communicated to him. On August 27, 2024, the TAHRIR Coalition and several of its member organizations, like S.A.F.E., called on Instagram followers to “Join us on the diag TOMORROW at 2:30pm to remind admin of their complicity in genocide!!...”; S.A.F.E. is formally listed as a “collaborator” in the post with the TAHRIR Coalition under its own Instagram handle @safeumich. CCI did not receive a Diag application from S.A.F.E. to use the space, as required and discussed further below.
  - On August 27, 2024, the CCI Director emailed S.A.F.E. and told them, “the Diag is reserved by the Center for Campus Involvement (CCI) tomorrow for Festifall. The Diag is unavailable for additional reservations or activities tomorrow. Festifall involves significant pedestrian traffic, and maintaining clear pathways is essential. Any obstruction can disrupt the event and pose safety risks. Thus, any activity that blocks traffic flow, access to Festifall tables and activities, and egress points is prohibited. As per university policies, unauthorized use of campus grounds and restricting the movement of others are violations. The university will enforce its policies and hold individuals accountable...I am happy to assist you in reserving the Diag on a different date and time for your event that does not conflict with other scheduled activities and follows the Diag reservation process...”
- Held a demonstration without an appropriate reservation and, in doing so, obstructed the flow of traffic through the Diag and disrupted the already-scheduled event on the Diag.
  - On August 28, 2024, S.A.F.E. commenced a die-in demonstration on the Diag. It posted a video and caption on Instagram under its @safeumich handle that said: “Die In On The Diag Now!” “JOIN US ON THE DIAG NOW! NO BACK TO SCHOOL DURING A GENOCIDE.”
  - S.A.F.E.’s demonstration event blocked traffic flow on the Diag and disrupted the function of Festifall, an event reserved by CCI for the same date and location as the die-in. Festifall is the largest student organization fair at the University of Michigan, with hundreds of student organizations and departments tabling across

the Central Campus Diag and Ingalls Mall. Thousands of students simultaneously transverse the walkways on these outdoor campus spaces during the event.

- S.A.F.E.'s purposeful obstruction and disruption in the middle of campus at Festifall went on for nearly two hours and resulted in 4 arrests, while most students sought to make connections with student organizations to get involved.
- S.A.F.E. deliberately disregarded the rules requiring it to obtain a permit, the email sent from the Director of CCI informing them that they could not use the Diag on that day, as well as clear instructions on the Diag itself that day, which informed all individuals and organizations that "The Diag and Ingalls Mall are reserved today exclusively for Festifall. Other uses are prohibited. The University will enforce its policies."
- Held a tabling event on the Diag without an appropriate permit on October 16, 2024
  - On October 16, 2024, S.A.F.E. set up an event on the Diag during which it offered food and other items for sale. S.A.F.E. acknowledged this event when it posted on Instagram "come to the diag!!! We're selling kuffiyehs, shirts, manaeesh and more!!! All proceeds to palestine!" S.A.F.E. continues to demonstrate a disregard for rules regarding the appropriate use of the Diag, which require organizations to first obtain a permit before setting up an event on the Diag.

S.A.F.E. has a demonstrated pattern of disregarding the appropriate use of University space. Accordingly, there is sufficient evidence in the record to conclude that S.A.F.E. did not use University space for an organized event in accordance with the standards for that space, violating the Appropriate Use of Space Standard of Conduct.

#### **b. Violation of III.B.10. Adherence to Other University Policies**

The Standards of Conduct state that all RSOs must adhere to "Other University policies" (the Standards explicitly mention, for example, policies governing use of the Diag). S.A.F.E. did not adhere to several University policies when it blatantly and repeatedly ignored CCI's instruction that the Diag was already booked for another use on August 28, 2024, and it nonetheless continued to engage in a die-in demonstration at the same time and in the same location as Festifall. S.A.F.E. also did not adhere to several University policies when it set up a table and sale of goods on the Diag on October 16, 2024. Specifically, S.A.F.E. failed to adhere to the following policies:

- [Central Campus Diag/North Campus Gerstacker Grove Policies and Procedures](#)
  - This policy states that activities must not substantially disrupt academic activities, university operations, university-sponsored events, or the activities of others. It also states that no sales of food are permitted on the Diag and that any

structures on the Diag, such as tables, require an approved event permit by the Center for Campus Involvement.

- S.A.F.E. violated this policy when they did not register and allow 72 hours for approval to use the Diag in connection with the Die-In on August 28, 2024.
  - Step one of the three-step reservation process requires that an RSO or University-affiliated department complete an application. S.A.F.E. did not complete this first step.
- S.A.F.E. violated this policy when they offered sales of food on the Diag and set up a table for its sale event without obtaining an event permit from the Center for Campus Involvement.
- [Festifall policies](#)
  - In addition to the general registration requirements an RSO must complete to reserve event space on the Diag, all organizations, departments, and vendors that participate in Fests at the University agree to a set standard of rules that are consistent among all Fests, no matter the time of year.
  - [Festifall](#) is an annual two-day Fest touted as the University's largest student organization fair of the year. The date of this year's event was posted at the start of the academic year. Approximately 965 student organizations were attending Festifall this year. RSOs paid \$30 each to participate.
  - The Behavior rules state, in relevant part, that "Disrupting / intimidating / vandalizing other tables / organizations / departments / individuals will result in removal of your organization from the event."
    - S.A.F.E. disrupted Festifall and students when they sat or laid down on the ground in the middle of a busy event on the Diag that was reserved by CCI and blocked foot traffic for two hours.
  - The Behavior rules state, "Do not engage in any activities or events that would create a safety or health hazard or violate University policies or city and state laws."
    - S.A.F.E. created a safety hazard by sitting and impeding pedestrian traffic with their bodies while holding objects as part of their die-in event.
  - The Behavior rules state, "Do not engage in other activities or events unless approved by Fests coordinators."
    - Despite having a reserved Festifall table, S.A.F.E. participated in an entirely different event than the planned Festifall tabling. Fest

coordinators did not approve their die-in event, and was not an appropriate activity for recruitment purposes at Festifall.

- [University of Michigan Division of Public Safety & Security. Protests and Demonstrations](#)

- The University's policy against violence in the community states:

The University is committed to maintaining an environment that is safe and free from violence and will not tolerate violent and threatening behavior. All University community members share the responsibility and are expected to maintain a climate of behavior that does not foster acts of violence, threats, and aggression.

- S.A.F.E. sent the message to the campus community through their Instagram that they would not be "going back to school during a genocide" and so disrupted, threatened, and intimidated students who were trying to actively participate in their educational programs and activities on campus and at Festifall. This was a clear interference with the educational function of the University, notwithstanding the actions of the four individuals whose conduct resulted in their respective arrests.

## **2. S.A.F.E. Demonstration on Regent Sarah Hubbard's Residence on May 15, 2024**

### **a. Violation of III.B.1. Health and Safety**

As stated in the Standards of Conduct, RSOs must not "foster, promote, or participate in activities that unreasonably threaten the safety or wellbeing of their members, other people, or animals."

S.A.F.E. violated the Health and Safety Standard when they did the following:

- Showed up, uninvited to the front door of Regent Hubbard's personal home by sending a member in a full face covering / mask to post demands on her door. The Ring doorbell photographs of this show how terrifying it would be to wake up and see that an unknown masked individual is approaching your door at 6am.
- Trespassed onto Regent Hubbard's front lawn, front porch, and driveway and set up tents, and littered debris such as body bags, cement blocks, and baby dolls on Regent Hubbard's personal property.
  - The red paint on the body bags and baby dolls was very likely meant to look like blood while the broken and painted baby dolls and broken crib was meant to symbolize children killed or maimed by bombs and other weapons. Creating this visual was meant to scare, intimidate and threaten Regent Hubbard in her own home. S.A.F.E. took credit for this demonstration when it posted, on May 15, 2024, on its @safeumich Instagram page, stating "GOOD MORNING, REGENT HUBBARD. STUDENTS DELIVER DEMANDS TO REGENT SARAH HUBBARD'S HOME."

- Used bull horns and bass drums to create alarming and intimidating disruption at and around Regent Hubbard's home during a time many individuals in her neighborhood would be asleep.
- Left a blood-soaked body bag blocking the front door, and other items, including a crib, on her front porch. Regent Hubbard, and her husband, could no longer exit the front door due to these items and could no longer drive away given that the demonstration took over her front yard and driveway. The inability for Regent Hubbard to leave her house via car or foot during the protest unequivocally threatened her wellbeing and safety.
- Left Regent Hubbard's property without cleaning up the voluminous and unsafe debris placed in her yard and front porch as part of the demonstration.
  - S.A.F.E. left all of the objects from its protest behind when it departed the area, including heavy and jagged cement blocks, broken furniture, bloodied body bags, and other debris. Not only were many of the demonstration items ostensibly unsafe and threatening, but there was also an unknown element as to whether the materials left behind had any further risk to them for whoever was expected to clean them up, which is incredibly unsettling, let alone dangerous.
- Promoted Regent Hubbard's private home location to the public.
  - It is well documented on Instagram that S.A.F.E. fundamentally disagrees with the University's and Regent Hubbard's position on many issues. While this disagreement is permissible, it is not permissible for S.A.F.E. to promote trespassing onto a Regent's private property for the sake of its cause. This encourages more harm against Regent Hubbard and others who may disagree with S.A.F.E. on various issues.

S.A.F.E.'s demonstration on Regent Sarah Hubbard's residence on May 15, 2024 not only violates III.B.1. of the Standards of Conduct but also poses an obvious and serious threat or harm to a member of the University community. As shown in the various X and Instagram posts from S.A.F.E. and Regent Hubbard, it is undisputed that S.A.F.E. is vehemently against the University's position on many policy issues and that it directs its anger at Regent Hubbard. It is absolutely permissible for students and student organizations to disagree with the University, but it is not okay to threaten harm to members of the University community. On May 15, 2024, things took a turn when S.A.F.E. escalated its attacks against Regent Hubbard by showing up at her home, marching on her driveway, leaving blood-soaked items in her yard, and deliberately engaging in behavior to threaten and intimidate her. In its own words, S.A.F.E. takes credit for this behavior. Not only did it record its demonstration but it then posted this narrative on its Instagram page on May 15, 2024: "GOOD MORNING, @thesarahhubbard...Regent Hubbard, we will hold you accountable for the 35,000+ Palestinians martyrs whose death you funded and profited from....we will continue to protest. You cannot hide."

Accordingly, for the reasons set forth above, a preponderance of the evidence in the record supports the conclusion that S.A.F.E., an RSO, violated the Standards of Conduct when it engaged in a demonstration at Regent Hubbard's private residence on May 15, 2024. This behavior clearly and unreasonably threatened the safety and well being of Regent Hubbard, her family, and others.

Q18. Please identify the resolution(s) that you would like to see as a result of the SOAR process.

The University concludes that S.A.F.E. violated the Standards of Conduct by a preponderance of the evidence. The University has considered precedent set by sanctions given to other RSOs found to have engaged in comparable, serious behavior. Accordingly, the University asks that S.A.F.E. be subject to a two to four-year suspension as an appropriate and necessary corrective action to hold S.A.F.E. accountable for their conduct outlined in this Complaint.